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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ECOLAB USA INC.

Plaintiff,

v.

PRO-POINT, INC.

Defendant.

Case No. 2:23-cv-02097-CDS-EJY

**JOINT MOTION TO STAY
SCHEDULING ORDER DEADLINES
DUE TO SETTLEMENT**

Pursuant to Local Rule 26-4, Plaintiff Ecolab USA Inc. ("Plaintiff") and Defendant Pro-Point, Inc. jointly request that the Court stay the deadline for the parties to submit a proposed discovery plan and scheduling order in light of the parties' ongoing efforts to memorialize and execute a settlement of this action:

In support of this Stipulation, the parties state as follows:

1. The parties believe they have arrived at principal terms to resolve this case and request that the proposed discovery plan and scheduling order deadline (ECF No. 23) be stayed while the parties work to memorialize and execute a written settlement of this action.

2. In the unlikely event that settlement does not occur, the parties will jointly notify the Court and request appropriate extensions of the remaining scheduling order deadlines.

1 3. This motion is brought in the interest of justice and not for the purpose of undue
2 delay.

3 4. The parties will agree to submit a status report in 60 days if this matter has not
4 concluded by then.

5 [SIGNATURES ON NEXT PAGE]
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Jointly and respectfully submitted this 24th day of May.

MORTENSON & RAFIE, LLP

/s/ Darius F. Rafie

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IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

DATED: May 25, 2024